



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

MAR 24 2011

Ms. Spring O'Mara  
ConocoPhillips  
Trainer Refinery  
4101 Post Road  
Trainer, PA 19061

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Ms. O'Mara:

This is in response to your request in a December 28, 2010, letter for approval of an alternative span value for the oxygen continuous emission monitoring system (CEMS) on the fluid catalytic cracking unit (FCCU) at ConocoPhillips' Trainer, Pennsylvania refinery. The refinery is subject to 40 CFR Part 60, Subpart J, Standards of Performance for Petroleum Refineries. Subpart J requires the CEMS to have a span value of 10 percent; however, a similar overlapping Pennsylvania Department of Environmental Protection (PADEP) regulation requires a span value of 25 percent. You desire to comply with the PADEP requirement, which is more consistent with the oxygen levels from the unit. You submitted data to show that these oxygen levels sometimes exceed 10 percent.

We agree that a span value of 25 percent is an appropriate alternative for your unit to the 10 percent level required in Subpart J. Therefore, we approve your request to use 25 percent as the span value for your oxygen CEMS on the FCCU at this facility. For this extended span range, the CEMS calibration gases should be representatively spaced and must bracket the emission oxygen levels. This approval is applicable to the facility cited above.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him at [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov).

Sincerely,

Conniesue B. Oldham, Ph.D., Group Leader  
Measurements Technology Group

cc: Bruce Augustine, Region 3  
Foston Curtis (E143-02)  
Leonard Hotham, Region 3  
Charles Zadakis, PADEP

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